

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
(Southern Division)**

JOHN AND KIMBERLY BEAHN, individually and as
parents and next friends of P.B., M.B., AND B.B.,
MINORS, and on behalf of all others similarly
situated, *et al.*

PLAINTIFFS,

v.

TRAVIS A. GAYLES, *et al.*

DEFENDANTS.

Case No.: _____

**PLAINTIFFS' MOTION FOR TEMPORARY,
PRELIMINARY, AND PERMANENT INJUNCTIVE RELIEF**

Plaintiffs, through the undersigned counsel and pursuant to Federal Rule of Civil Procedure 65, respectfully request that the Court issue temporary, preliminary, and permanent injunctive relief enjoining Defendants from enforcing the order issued by Defendant Travis A. Gayles on Friday, July 31, 2020 which prohibits the physical opening of religious schools or private schools for in-person instruction. A memorandum of points and authorities in support of this motion follows and is incorporated herein.

Respectfully submitted,

JOSEPH, GREENWALD, AND LAAKE, P.A.

/s/ Timothy F. Maloney

Timothy F. Maloney
Alyse L. Prawde
6404 Ivy Lane, Suite 400
Greenbelt, MD 20770
Phone: (301) 220-2200
Fax: (240) 553-1761
tmaloney@jgllaw.com
aprawde@jgllaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of August, 2020, a copy of the foregoing and the supporting memorandum were sent via Federal Express to the following:

Travis A. Gayles
Montgomery County Department of
Health and Human Services
1301 Piccard Drive
Rockville, Maryland 20850

Marc Elrich
County Executive of Montgomery County
101 Monroe Street, 2nd Floor
Rockville, Maryland 20850

/s/

Timothy F. Maloney